

## CHAPTER 10

### SECTION 4 POLLUTION PREVENTION STRATEGY

#### 10.4.1 PURPOSE

This section establishes the pollution prevention strategy for APHIS and states the responsibilities, goals, and guidelines for source reduction and pollution prevention.

#### 10.4.2 BACKGROUND

On August 3, 1993, President Clinton issued Executive Order (EO) 12856 titled, "Federal Compliance with Right-to-Know and Pollution Prevention Requirements." The EO expands the Emergency Planning and Community Right-to-Know Act (EPCRA) and the Pollution Prevention Act (PPA) reporting requirements to include Federal agencies. The order is applicable to Federal agencies that own or operate one or more *covered* facilities. *Covered* facilities include all Federal facilities that meet one or more of the following threshold reporting requirements under EPCRA:

Section 302	Facility has an Extremely Hazardous Substance (EHS) at or above the threshold planning quantity (TPQ). (RE: 40 Code of Federal Regulations, Part 355)
Section 304	Facility releases an EHS or Hazardous Substance at or above a reportable quantity. (RE: 40 Code of Federal Regulations, Section 302.4 and Part 355)
Section 311-312	Facility has 10,000 pounds of a hazardous chemical, or 500 pounds (or TPQ) of an EHS. (RE: 40 Code of Federal Regulations, Section 370.20)
Section 313	Facility manufactures or processes 25,000 pounds of a listed toxic chemical, or otherwise uses 10,000 pounds of a listed toxic chemical. (RE: 40 Code of Federal Regulations, Sections 372.22, 372.25, and 372.65)

Based on information obtained during a 1994 facilities review, APHIS has one facility which meets the *covered* facility definition. It is the Pocatello Supply Depot in Pocatello, Idaho.

**NOTE: Collateral Duty Safety and Health Officers, Facility Supervisors, or employees should notify the Safety, Health, and Environmental Staff of any other covered facilities.**

Under the conditions of EO 12856, APHIS is required to develop a written pollution prevention strategy which incorporates source reduction into facility management and acquisition programs, outlines plans for compliance, and establishes goals for pollution prevention and source reduction.

APHIS and Agency facilities are also required to comply with other applicable provisions of EO 12856, EPCRA, and PPA. The Safety, Health, and Environmental Staff can provide information concerning applicable provisions.

#### 10.4.3 AUTHORITIES/REFERENCES

- A. EO 12858, Federal Compliance with Community Right-to-Know Laws and Pollution Prevention Requirements.
- B. United States Environmental Protection Agency (USEPA) Publication, EPA 300-B-94-007, April 1994, Pollution Prevention in the Federal Government.
- C. USEPA Publication, March 1994, Interpretive Guidance for Implementation of EO 12856.

#### 10.4.4 POLICY

APHIS is committed to promoting pollution prevention practices throughout the Agency, and identifying source reduction opportunities.

It is APHIS policy that pollution be prevented or reduced at the source. Pollution that cannot be prevented will be recycled in an environmentally safe manner. Pollution that cannot be prevented or recycled will be treated in an environmentally safe manner. Finally, disposal or release activities will be performed as a last resort and will be conducted in an environmentally safe manner.

APHIS will work closely with the public and local emergency planning committees to provide them with any information they require both to protect the public and inform the public about toxic and hazardous chemicals, and hazardous substances used and stored at APHIS facilities in their communities.

APHIS will train all necessary personnel in the requirements of the Emergency Planning and Community Right-to-Know Act and the Pollution Prevention Act.

#### 10.4.5 RESPONSIBILITIES

- A. The Environmental Pollution Control Coordinator (EPCC) will serve as the coordinator for pollution prevention and source reduction (P2/SR) efforts. The EPCC responsibilities include:
  - 1. Developing new program policies and initiatives.
  - 2. Monitoring and auditing program activities.
  - 3. Promoting awareness within the Agency.
  - 4. Preparing any required annual status and accomplishment reports.
- B. Collateral Duty Safety and Health Officers (CDSHO) are responsible for:
  - 1. Disseminating information regarding the program policies to appropriate facilities and personnel.

2. Assisting in identifying facilities where P2/SR activities may be implemented.
  3. Maintaining contact with the EPCC.
- C. Facility Supervisors are responsible for:
1. Ensuring that their facilities meet EPCRA and PPA requirements.
  2. Providing information regarding EPCRA and PPA activities to the CDSHO and EPCC.
- D. Employees are the key to identifying innovative approaches to source reduction, and successfully preventing and reducing pollution. In many cases, the best suggestions for pollution prevention come from the thoughtfulness and ingenuity of employees. Therefore, employees who are responsible for handling hazardous or toxic materials must be familiar with the requirements and intent of EPCRA and PPA. Any suggestions regarding the P2/SR should be forwarded to the facility supervisor.

#### 10.4.6 GOALS

The overall goal of the APHIS pollution prevention program is to plan and conduct Agency activities in such a manner as to eliminate or reduce the generation and off-site transfer of toxic chemical pollutants. Pollution prevention/source reduction principles will be applied at APHIS facilities. The reduction goals are as follows:

- A. Section 313 - Covered Facilities. APHIS facilities which are subject to the Toxic Release Inventory reporting requirements established under section 313 of the EPCRA, will establish a 50 percent reduction goal for their releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals for treatment and disposal, using a baseline no later than 1994. The reduction must be accomplished by the year 1999.
- B. Other Covered Facilities. APHIS is also seeking a 30 percent reduction in total releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals for treatment and disposal, at other *covered* APHIS facilities where this reduction is feasible. Any available baseline information for 1994 or later will be used to measure source reductions. The reduction must be accomplished by the year 1999.
- C. Non-Covered Facilities. APHIS facilities which possess toxic chemicals below established threshold limits are encouraged to implement pollution prevention strategies.

#### 10.4.7 STRATEGY

Reductions will be achieved by eliminating or reducing unnecessary acquisition, manufacturing, processing, or use of products containing extremely hazardous substances and toxic chemicals. Where necessary, APHIS will also provide pollution prevention awareness training for personnel involved with the acquisition, manufacturing, or use of toxic or hazardous chemicals. APHIS

facilities will develop and/or employ state of the art equipment to reduce toxic waste generation.

*Covered* APHIS facilities will examine opportunities and systems to eliminate or reduce their releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals for treatment and disposal. These facilities will develop, update, and implement pollution prevention plans.

APHIS will also encourage all APHIS facilities to establish pollution prevention/source reduction goals.

APHIS facilities must also comply with all applicable requirements and guidelines established under EPCRA.

#### 10.4.8 INQUIRIES

Inquiries regarding the Pollution Prevention Strategy should be directed to the EPCC or the Safety, Health, and Environmental Staff on (301) 734-5383.